

# **EXHIBIT 1**



**WR Grace**  
Property Damage  
Index Sheet

SR00000808

Claim Number: 00009911

Receive Date: 03/31/2003

**Multiple Claim Reference**

Claim Number	<input type="checkbox"/> MMPOC	Medical Monitoring Claim Form
	<input type="checkbox"/> PDPOC	Property Damage
	<input type="checkbox"/> NAPO	Non-Asbestos Claim Form
	<input type="checkbox"/>	Amended
Claim Number	<input type="checkbox"/> MMPOC	Medical Monitoring Claim Form
	<input type="checkbox"/> PDPOC	Property Damage
	<input type="checkbox"/> NAPO	Non-Asbestos Claim Form
	<input type="checkbox"/>	Amended

**Attorney Information**

Firm Number: 00131 Firm Name: Speights &amp; Runyan

Attorney Number: 00227 Attorney Name: Daniel A Speights

Zip Code: 29924

Cover Letter Location Number: SR00000808

Attachments Medical Monitoring	Attachments Property Damage	Non-Asbestos
<input type="checkbox"/> TBD	<input type="checkbox"/> TBD	<input type="checkbox"/> Other Attachments
<input type="checkbox"/> TBD	<input type="checkbox"/> TBD	
<input type="checkbox"/> TBD	<input type="checkbox"/> TBD	
<input type="checkbox"/> TBD	<input type="checkbox"/> TBD	
<input type="checkbox"/> TBD	<input type="checkbox"/> TBD	
	<input checked="" type="checkbox"/> Other Attachments	
<b>Other</b>	<input type="checkbox"/> Non-Standard Form	
	<input type="checkbox"/> Amended	
	<input type="checkbox"/> Post-Deadline Postmark Date	

Box/Batch: WRPC0067/WRPD0026

Document Number: WRPD001253

**PART 1: CLAIMING PARTY INFORMATION**

NAME:

ANDERSON MEMORIAL HOSPITAL (SEE ATTACHED)

*Name of individual claimant (first, middle and last name) or business claimant*

SOCIAL SECURITY NUMBER (Individual Claimants): F.E.I.N. (Business Claimants)

*(last four digits of SSN)*

Other names by which claiming party has been known (such as maiden name or married name):

*First**Mi**Last**First**Mi**Last*GENDER: ☐ MALE ☐ FEMALE

Mailing Address:

*Street Address**City**State**Zip Code**Country**(Province) (Postal Code)***PART 2: ATTORNEY INFORMATION**

The claiming party's attorney, if any (You do not need an attorney to file this form):

Law Firm Name:

SPEIGHTS &amp; RUNYAN

Name of Attorney:

AMANDA G STEINMEYER

*First**Mi**Last*

Mailing Address:

P O BOX 685 - 200 JACKSON AVENUE EAST

*Street Address*

HAMPTON

*City*

SC

*State*

29924

*Zip Code*

Telephone:

(803) 943-4444

*Area Code**(Province) (Postal Code)*

REC'D MAR 8 1 2003

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WR Grace PD.7.26.1253

00009911

SR-600

**PART 3: PROPERTY INFORMATION****A. Real Property For Which A Claim Is Being Asserted**

1. What is the address of the real property for which a claim is being asserted (referred to herein as "the property")?

VARIOUS LOCATIONS

Street Address

WORLDWIDE

City

State Zip Code

(Province) (Postal Code)

UNITED STATES

Country

2. Are you completing an Asbestos Property Damage Proof of Claim Form for any other real property other than the one listed at "1" above?

☒ Yes ☐ No

3. Do you currently own the property listed in Question 1, above?

☒ Yes ☐ No

4. When did you purchase the property?

- - - - - VARIOUS  
Month Day Year

5. What is the property used for (check all that apply)

☐ Owner occupied residence☐ Residential rental☒ Commercial☐ Industrial

Specify:

☐ Other

Specify:

6. How many floors does the property have?

- - - - - VARIOUS

7. What is the approximate square footage of the property?

- - - - - VARIOUS

8. When was the property built?

☒ Before 1969☒ 1969 - 1972☐ After 1972

9. What is the structural support of the property?

☒ Wood frame☒ Structural concrete☒ Brick☒ Steel beam/girder☐ Other

Specify:

10. Have you or has someone on your behalf completed any interior renovations on the property which affected any asbestos on the property?

☒ Yes ☐ No

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200778-00

**A. Real Property For Which A Claim Is Being Asserted (continued)**

If yes, please specify the dates and description of such renovations.

--	--	--	--

Year

Description: MULTIPLE RENOVATIONS OVER VARIOUS YEARS

--	--	--	--

Year

Description:

--	--	--	--

Year

Description:

11. To the best of your knowledge, have any other interior renovations been completed on the property during any other period of time which affected any asbestos on the property?

☒ Yes ☐ No

If yes, please specify the dates and descriptions of such renovations.

--	--	--	--

Year

Description: MULTIPLE RENOVATIONS OVER VARIOUS YEARS

--	--	--	--

Year

Description:

--	--	--	--

Year

Description:

**B. Claim Category**

12. For which category are you making a claim on the property?

☒ Category 1: Allegation with respect to asbestos from a Grace product in the property☐ Category 2: Allegation with respect to one of Grace's vermiculite mining, milling or processing operations

If you checked Category 1 in question 12, complete Section C.

If you checked Category 2 in question 12, complete section D.

**C. Category 1 Claim: Allegation With Respect To Asbestos From A Grace Product In The Property**

13. For what alleged asbestos-containing product(s) are you making a claim?

☐ Minnekota-3 fireproofing insulation☒ Other Specify: SEE ATTACHED

(For a list of the brand names under which Grace manufactured products that may have contained commercially added asbestos, see Exhibit 2 to the Claims Bar Date Notice provided with this Proof of Claim Form.)

14. When did you or someone on your behalf install the asbestos-containing product(s) in the property?

--	--	--	--

Year

☒ I did not install the product(s)

15. If you or someone on your behalf did not install the asbestos-containing product(s), to the best of your knowledge, when was/were the product(s) installed?

--	--	--	--

Year

☒ I don't know.

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16. Do you have documentation relating to the purchase and/or installation of the product in the property?

☐ Yes ☒ No

If Yes, attach all such documents. If the documents are too voluminous to attach, attach a summary of the documents indicating the name of each document, date of each document, a brief description of the document, the location of the document, and who has possession and control of the document.

If you provide a summary of documents rather than the documents themselves, you are required to consent to the production and release of those documents to Grace upon Grace's further request.

17. If you do not have any such documents, explain why not and indicate who may have possession or control of such documents with respect to the property.

SEE ATTACHED

18. When did you first know of the presence of asbestos in the property of the Grace product for which you are making this claim?

2003

Year

Please attach all documents relating or referring to the presence of asbestos in the property for which you are making this claim. If the documents are too voluminous to attach, attach a summary of the documents indicating the name of each document, date of each document, a brief description of the document, the location of the document, and who has possession and control of the document.

If you provide a summary of documents rather than the documents themselves, you are required to consent to the production and release of those documents to Grace upon Grace's further request.

19. How did you first learn of the presence of asbestos in the property of the Grace product for which you are making this claim?

SEE ATTACHED

20. When did you first learn that the Grace product for which you are making this claim contained asbestos?

2003

Year

21. How did you first learn that the Grace product for which you are making the claim contained asbestos?

SEE ATTACHED

22. Have you or someone on your behalf made an effort to remove, contain and/or abate the Grace product for which you are making this claim?

☒ Yes ☐ No

If Yes, attach all documents relating or referring to such efforts. If the documents are too voluminous to attach, attach a summary of the documents indicating the name of each document, date of each document, a brief description of the document, the location of the document, and who has possession and control of the document.

If you provide a summary of documents rather than the documents themselves, you are required to consent to the production and release of those documents to Grace upon Grace's further request.

23. If you do not have any such documents, explain why not and indicate who may have possession and control of such documents with respect to the property.

SEE ATTACHED

24. If you or someone on your behalf did not make an effort to remove, contain and/or abate the Grace product(s) for which you are making a claim, to the best of your knowledge, did anyone else make such an effort?

☒ Yes ☐ No

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03/22/05-06

25. If you responded Yes to question 22, or 24, and you have not supplied documents, please specify the dates and descriptions of any such efforts

Year	Description
	SEE ATTACHED
Year	Description
Year	Description

26. Have you or anyone on your behalf ever conducted any testing or sampling for the presence of asbestos or other particulates in the property?

☒ Yes ☐ No **If Yes, Attach All Documents Related To Any Testing Of The Property.**

27. If you responded Yes to question 26, but you have not provided documents, indicate who may have possession or control of such testing documents or where such documents may be located.

**SEE ATTACHED**

28. If you or someone on your behalf did not conduct any testing or sampling for the presence of asbestos or other particulates on the property, to the best of your knowledge, did anyone else conduct such testing or sampling with respect to the property?

☐ Yes ☐ No NOT APPLICABLE

29. If you responded Yes to question 26, or 28, and you have not supplied related documents, please describe when and by whom and the type of testing and/or sampling (e.g. air, bulk and dust sampling).

Year	Company/Individual	VARIOUS YEARS, NUMEROUS SAMPLES
	Type of testing:	
Year	Company/Individual	
	Type of testing:	
Year	Company/Individual	
	Type of testing:	

30. Has the Grace product or products for which you are making this claim ever been modified and/or disturbed?

☒ Yes ☐ No

31. If yes, specify when and in what manner the Grace product or products was modified and/or disturbed?

Year	Description
	AFFECTED BY NUMEROUS CUSTODIAL AND MAINTENANCE ACTIVITIES AND RENOVATIONS
Year	Description
Year	Description

9276105

SERIAL #:

W.R. Grace & Co.

Asbestos Property Damage

(9276)

Proof of Claim Form

Missing Page

1 2 3 4 5

⑥ ⑦ ⑧ 9 10

**PART 4: ASBESTOS LITIGATION AND CLAIMS****A. INTRODUCTION**

1. Has any asbestos-related property damage lawsuit or claim been filed against Grace on behalf of this claiming party relating to the property for which you are making this claim?

☐ No  
☒ Yes - lawsuit  
☐ Yes - non-lawsuit claim (other than a workers' compensation claim)

2. Has any asbestos-related property damage lawsuit or claim been filed against any other party on behalf of this claiming party relating to the property for which you are making this claim?

☐ No  
☒ Yes - lawsuit  
☐ Yes - non-lawsuit claim (other than a workers' compensation claim)

*If an asbestos-related property damage lawsuit has been filed by or on behalf of this claiming party relating to the property for which you are making a claim, complete Section B. below.*

*If an asbestos-related property damage non-lawsuit claim has been made by or on behalf of this claiming party relating to the property for which you are making a claim, complete Section C. on the following page.*

**B. LAWSUITS**

1. Please provide the following information about each asbestos-related property damage lawsuit which has been filed relating to the property for which you are making this claim or attach a copy of the face page of each complaint filed.

a. Caption: ANDERSON MEMORIAL HOSPITAL, ON BEHALF OF ITSELF & OTHERS SIMILARLY SITUATED  
V. W.B. GRACE & COMPANY ET AL.

b. Court where suit originally filed: HAMPTON SC Docket No.: 92CP25279  
County/State

c. Date filed: 12 - 23 - 1992  
Month Day Year

a. Caption:

b. Court where suit originally filed:  Docket No.:   
County/State

c. Date filed:  -  -   
Month Day Year

a. Caption:

b. Court where suit originally filed:  Docket No.:   
County/State

c. Date filed:  -  -   
Month Day Year

(Attach additional pages if necessary.)

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**C. NON-LAWSUIT CLAIMS**

1. If the claiming party has made any claims relating to the property for which you are making a claim (including administrative claims) against anyone, that was not filed with a court of law, please provide the following information for each claim:

a. Description of claim:

b. Date submitted:  -  -   
Month Day Year

c. Name of entity to whom claim was submitted:  
☐ Grace  
☐ Other   
 Name of Entity:

a. Description of claim:

b. Date submitted:  -  -   
Month Day Year

c. Name of entity to whom claim was submitted:  
☐ Grace  
☐ Other   
 Name of Entity:

a. Description of claim:

b. Date submitted:  -  -   
Month Day Year

c. Name of entity to whom claim was submitted:  
☐ Grace  
☐ Other   
 Name of Entity:

**PART 5: SIGNATURE PAGE**

All claims must be signed by the claiming party.

I have reviewed the information submitted on this proof of claim form and all documents submitted in support of my claim. I declare, under penalty of perjury,\* that the above statements are true, correct, and not misleading.

**CONSENT TO RELEASE OF RECORDS AND INFORMATION:** To the extent that I have produced a summary rather than the documents themselves as requested above or indicated who has possession and control of certain documents, I hereby authorize and request that all other parties with custody of any documents or information concerning my property damage or the information contained in this Form, upon the reasonable request of Grace or Grace's representative, with a copy to this claiming party, disclose any and all records to Grace or to Grace's representative.

  
 SIGNATURE OF CLAIMANT AMANDA G. STEINHILBER  03-30-2003  
 Month Day Year

\*The penalty for presenting a fraudulent claim is a fine up to \$502,000.00 or imprisonment up to 5 years, or both 18 U.S.C. §§ 122 & 3571.

9276110

SERIAL #

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**Response to PART-1 - NAME:**

ANDERSON MEMORIAL HOSPITAL ON BEHALF OF ALL BUILDINGS ENCOMPASSED IN ITS CLASS ACTION COMPLAINT. ATTACHED TO THIS CLAIM IS A NON-EXHAUSTIVE LIST OF BUILDINGS OR BUILDING OWNERS KNOWN AS OF THIS DATE. CLAIMANT RESERVES THE RIGHT TO SUPPLEMENT THIS CLAIM AS ADDITIONAL BUILDINGS OR BUILDING OWNERS ARE LOCATED OR COME FORWARD.

**Response to Questions 13 (Specify):**

SURFACE TREATMENT, INCLUDING BUT NOT LIMITED TO FIREPROOFING, ACOUSTICAL PLASTER, TEXTURE, MASONRY FILL, OR OTHER ASBESTOS-CONTAINING PRODUCTS.

**Response to Question 17:** The Claimant understands Question 16 to ask for the existence of historical documents demonstrating that Grace's asbestos-containing product was purchased and/or installed in the property. As indicated in its response, the Claimant does not know of any such specific documents at this time. The Claimant assumes that there would have been a large number of original construction documents, including drawings and specifications, which, if not destroyed in the ordinary course of business, might possibly be found at a number of storage facilities, including those under the control of various persons involved with the design and construction of the property and the sale and installation of products in the property. In addition, this claim is based upon an assertion that debtors manufactured or sold products containing asbestos that are or were present in this property and/or all other theories of liability that are allowed by law including but not limited to conspiracy and fraudulent transfer. Moreover, Claimant believes Grace itself may be in control of supporting documentation, or other supporting information, regarding whom Grace or their salesmen sold their products to, and Claimant may need documentation or discovery from Grace on this issue. Claimant does not waive any rights, but is willing to discuss this matter with Grace if it believes Claimant's response is insufficient.

**Response to Question 19:** Refer to Question 17 Response.

**Response to Question 21:** Refer to Question 17 Response.

**Response to Question 23:** Taken literally, Question 22 seeks all documents relating to not only the removal, enclosure and encapsulation, but operations and maintenance documents which attempt to contain contamination from Grace's product. There is insufficient time to locate all such documents that might be called for in Question 22. To the extent that such documents have not been destroyed in the ordinary course of business, they may exist in the files or dead storage of many persons involved with such projects. Before undertaking an effort of this magnitude, Claimant would like to work with Grace to understand exactly what it is that Grace is seeking and whether Claimant can easily accommodate that request.

**Response to Question 27:** As Claimant understands Question 26, Grace seeks all documents of every kind and description not only related to the testing or sampling for the presence of asbestos, including samples taken during any abatement projects, as well as all

samples related to any other particulates, including by way of example only, all silicates, lead dust and other metal dust, beta glucans, etc. Such documents, to the extent they exist, may not only be in the possession of Claimant, but a number of third party contractors and/or consultants as well. Before undertaking the search for all of these documents, Claimant wishes to discuss this matter with Grace and obtain a clarification.